

REMARKS/ARGUMENTS

The Office Action mailed March 20, 2006 has been carefully considered.

Reconsideration in view of the following remarks is respectfully requested.

With this response it is respectfully submitted the claims satisfy the statutory requirements.

The First 35 U.S.C. § 103 Rejection

Claims 1-17 and 23-39 were rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Block et al.¹ in view of Malloy et al.², among which claims 1 and 23 are independent claims. This rejection is respectfully traversed.

According to the Manual of Patent Examining Procedure (M.P.E.P.),

To establish a *prima facie* case of obviousness, three basic criteria must be met. First there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, not in the applicant's disclosure.³

Specifically, the Office Action contends that the elements of the presently claimed invention are disclosed in Block except that Block does not teach “organizing internal metadata in a grid having rows and columns, wherein dimensional metadata from said internal metadata is placed in the grid has row headings and/or column headings” or “receiving from a user a

¹ U.S. Publication No. US 2003/0037038

² U.S. Publication No. US 2004/0122844

³ M.P.E.P § 2143.

selection of a portion of said grid, said selection indicating internal metadata to be mapped.”⁴

The Office Action further contends that Malloy teaches these elements and that it would be obvious to one having ordinary skill in the art at the time of the invention to incorporate Malloy into Block in order to provide the benefit of an improved relational OLAP system. The Applicants respectfully disagree for the reasons set forth below.

Contrary to what is stated in the Office Action, Block does not teach or suggest “creating a mapping between said selected internal metadata and said defined external metadata.” The Office Action cites paragraphs 15 and 16 as allegedly describing this element. However, Block describes adding internal metadata to data. Paragraph 15 describes the addition of this internal metadata to internal data, whereas paragraph 16 describes the addition of this internal metadata to external data (imported from an external source). Block fails to teach any correlation between internal metadata and external metadata, and in fact fails to mention external metadata at all. As such, Applicant respectfully submits that Block fails to teach or suggest “creating a mapping between said selected internal metadata and said defined external metadata.”

Furthermore, contrary to what is stated in the Office Action, Block fails to teach or suggest “receiving from said user a definition of external metadata describing all data points within said selection.” As described above, Block fails to teach or suggest the use of external metadata at all. Additionally, the export file described in paragraph 16 of Block is not limited to data points within a selection of internal metadata, as outlined in claim 1. Block does not describe what the export file is based on, only stating that “at least a portion of an XBRL compliant data set” may be imported “into a non XBRL compliant target application.” Indeed,

⁴ Office Action ¶ 3-1.

since it appears that the user is expected to export the data from the external source himself, it appears likely that the file is based on selections the user makes using the external software, without any regard to a selection made on internal metadata.

As such, Applicant respectfully submits that Claim 1 is in condition for allowance.

As to independent Claim 23, this claim contains elements similar to that as described above with respect to Claim 1, and as such Applicant respectfully submits that Claim 23 is also in condition for allowance.

As to dependent claims 2-17 and 24-39, the argument set forth above is equally applicable here. The base claims being allowable, the dependent claims must also be allowable.

The Second 35 U.S.C. § 103 Rejection

Claims 18-22 were rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Block et al., among which claim 18 is an independent claim. This rejection is respectfully traversed.

The Office action admits that Block does not teach internal and external metadata, but does not provide a specific reference where such a limitation is found, instead arguing that one of ordinary skill in the art would have found it obvious to modify the invention in Block to arrive at the additional claim limitation. Therefore, applicant assumes that the Office Action intended to take official notice of facts under M.P.E.P. 2144.03 that the rationale supporting the obviousness

rejection is based on common knowledge in the art or "well-known" prior art. Under M.P.E.P. 2144.03, "[i]f the applicant traverses such an assertion the examiner should cite a reference in support of his or her position." Applicant hereby traverses the assertion and requests that a reference be cited in support of the position outlined in the Office Action.

Nevertheless, Block fails to teach or suggest "an external metadata user definition receiver" or "an internal metadata-to-defined external metadata mapping creator" as claimed in Claim 18 for the same reasons as described above with respect to Claim 1.

As to dependent claims 19-22, the argument set forth above is equally applicable here. The base claims being allowable, the dependent claims must also be allowable.

In view of the foregoing, it is respectfully asserted that the claims are now in condition for allowance.

Conclusion

It is believed that this Amendment places the above-identified patent application into condition for allowance. Early favorable consideration of this Amendment is earnestly solicited.

If, in the opinion of the Examiner, an interview would expedite the prosecution of this application, the Examiner is invited to call the undersigned attorney at the number indicated below.

Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

Please charge any additional required fee or credit any overpayment not otherwise paid or credited to our deposit account No. 50-1698.

Respectfully submitted,

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